

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

ALEXANDRA M. CLANCY,

Plaintiff

v.

Case No. 1:17-cv-03371-ELH

J.W. THOMPSON WEBB., et al.,

Defendants.

**JOINT MOTION TO VACATE SCHEDULING ORDER
AND TRIAL DATE AND TO STAY CASE**

The active parties, through their undersigned counsel, jointly move to vacate the scheduling order and the scheduled trial date, and stay the case while they seek to reach a final global settlement of all issues between them, and state as follows:

1. The plaintiff in this case is Alexandra Clancy, the widow of the author Thomas L. Clancy (“Tom Clancy”). The case involves the rights of the Estate of Tom Clancy and defendants Jack Ryan Enterprises, Ltd. and Jack Ryan Limited Partnership (the “JR Entities”) in certain intellectual property.

2. In addition to the dispute in this case, there is a dispute between Alexandra Clancy and the children from Tom Clancy’s first marriage relating to the Estate of Tom Clancy.

3. Alexandra Clancy, the JR Entities, and the children from Tom Clancy’s first marriage have reached an agreement in principle to globally resolve all of their disputes. The parties anticipate that it may take from 90 to 120 days to fully flesh out the details of the settlement in principle and reduce it to one or more final written agreements.

4. The Scheduling Order in this case (ECF 164 as modified by ECF 166) presently has certain deadlines relating to experts, Daubert briefing, a pretrial order, a pretrial conference and a bench trial to commence on January 24, 2022.

5. The parties jointly believe that their efforts should be directed to working on the settlement and not continuing the litigation at this time. Accordingly, Alexandra Clancy and the JR Entities jointly request that the Scheduling Order and the trial date be vacated, and the case stayed.

6. The parties will continue to periodically report on their progress to Judge Gesner.

7. Counsel for nominal defendant J.W. Thompson Webb, as Personal Representative of the Estate of Thomas L. Clancy, consents to the relief sought in this motion.

WHEREFORE, the parties respectfully request that the Court vacate the Scheduling Order, vacate the trial date, and stay this case, all subject to further Order of Court.

Respectfully submitted,

/s/Norman L. Smith

Norman L. Smith, Fed Bar No. 24057

nsmith@nusinovsmith.com

Jeffrey E. Nusinov, Fed. Bar No. 26701

jnusinov@nusinovsmith.com

Paul D. Raschke, Fed. Bar No. 03428

praschke@nusinovsmith.com

NUSINOV SMITH LLP

The Marbury Building

6225 Smith Avenue, Suite 200B

Baltimore, MD 21209

(410) 554-3600

(410) 554-3636 (fax)

Attorneys for Plaintiff/Counter-Defendant Alexandra M. Clancy

/s/Jerrold A. Thrope

Jerrold A. Thrope (Fed. Bar No. 01376)

GORDON FEINBLATT LLC

233 East Redwood Street

Baltimore, MD 21202

(410) 576-4295

(410) 576-4269 (fax)

jthrope@gfrlaw.com

/s/ Scott J. Bornstein

Scott J. Bornstein (*pro hac vice*)
Justin A. MacLean (*pro hac vice*)
GREENBERG TRAURIG, LLP
MetLife Building
200 Park Avenue
New York, NY 10166
(212) 801-9200
(212) 801-6400 Fax

Attorneys for Defendants/Counter-Plaintiffs
Jack Ryan Enterprises, LTD and
Jack Ryan Limited Partnership

/s/ Robert S. Brennen

Robert S. Brennen (Fed. Bar No. 04499)
Miles & Stockbridge P.C.
100 Light Street
Baltimore, Maryland 21202
(410) 727-6464 (Phone)
(410) 385-3700 (Fax)
rbrennen@milesstockbridge.com

Counsel for Personal Representative for the Estate of
Thomas L. Clancy, Jr.